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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EVERETT BLOOM, JACK GRAHAM,
AND DAVE LINDHOLM, on behalf of
themselves, and those similarly situated,

Plaintiffs,

v.

ZUFFA, LLC; ENDEAVOR
STREAMING, LLC; and ENDEAVOR
GROUP HOLDINGS, INC.

Defendants.

Case No.: 2:22-cv-00412-RFB-BNW

**JOINT STIPULATION TO EXTEND
MOTION TO COMPEL BRIEFING
SCHEDULE AND [PROPOSED] ORDER**

(First Request)

1 Pursuant to LR 7-1 and LR IA 6-1, Plaintiffs Everett Bloom, Jack Graham, and Dave
2 Lindholm (collectively, “Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (together, the
3 “Parties”) hereby stipulate to extend the briefing schedule on Zuffa’s Motion to Compel, which
4 was filed on June 23, 2023. This is the Parties’ first stipulation regarding the Motion to Compel
5 briefing schedule.

6 WHEREAS, on December 5, 2022, Zuffa served its First Set of Requests for Production
7 and Interrogatories on Plaintiff Bloom;

8 WHEREAS, on May 29, 2023, Plaintiffs filed the First Amended Class Action
9 Complaint (“FAC”) (ECF No. 47), adding Plaintiffs Jack Graham and Dave Lindholm;

10 WHEREAS, on June 2, 2023, Zuffa served discovery requests on new Plaintiffs Graham
11 and Lindholm;

12 WHEREAS, on June 23, 2023, after numerous meet and confers between the Parties,
13 Zuffa filed a Motion to Compel Discovery from Plaintiff Everett Bloom (ECF No. 57);

14 WHEREAS, Plaintiffs’ current deadline to file an Opposition to the Motion to Compel is
15 July 7, 2023, and Zuffa’s current deadline to file a Reply Brief is July 14, 2023;

16 WHEREAS, due to a family emergency, Plaintiffs’ counsel Kali Backer has been away
17 on an extended absence during the time Zuffa’s Motion to Compel has been pending, leaving
18 Plaintiffs’ counsel short-staffed;

19 WHEREAS, Plaintiffs’ counsel have represented they will make a good faith attempt to
20 produce additional documents and information responsive to some of Zuffa’s discovery
21 requests;

22 WHEREAS, Zuffa maintains that it requires full and complete responses to each and
23 every discovery request, as explained in its Motion to Compel;

24 WHEREAS, the Parties are discussing a potential resolution of at least portions of the
25 Motion to Compel, which may narrow the discovery issues to be addressed with respect to all
26 Plaintiffs;

27 WHEREAS, the Parties have met and conferred and agree that Plaintiffs’ deadline to file
28 an Opposition to the Motion to Compel should be extended by ten days (i.e., to July 17, 2023),

and Zuffa's deadline to file a Reply Brief should be extended by four days to a total of eleven days from the date of the Opposition (i.e., to July 28, 2023).

THEREFORE, the Parties hereby stipulate and agree that the briefing schedule on Zuffa's Motion to Compel shall be extended as follows:

- Plaintiffs' Opposition to the Zuffa's Motion to Compel will be due by July 17, 2023;
- Zuffa's Reply Brief in Support of its Motion to Compel will be due by July 28, 2023;
- and
- Nothing in this stipulation shall be construed as a waiver of any of Defendants' rights or defenses, including, without limitation, jurisdictional defenses.

STIPULATED AND AGREED to this 6th day of July 2023.

By: /s/ Anthony J. Patek/

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IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 6th day of July, 2023.